

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

CONNECTOR CASTINGS, INC.,)	
)	
Plaintiff,)	
)	
vs.)	Case No. _____
)	
JOSEPH T. RYERSON & SON, INC., d/b/a)	
RYERSON, and JOHN DOES 1-10,)	
)	
Defendants)	

NOTICE OF REMOVAL

Defendant Joseph T. Ryerson & Son, Inc. (“Ryerson”), by and through its counsel, respectfully submits this Notice of Removal of this action pursuant to 28 U.S.C. §§ 1331 and 1441. This cause is now pending in the Missouri Circuit Court for the 22nd Judicial Circuit, under the name *Connector Castings, Inc. v. Joseph T. Ryerson & Son, Inc. d/b/a Ryerson, and John Does 1-10*, Case No. 1522-CC00949 (the “State Court Action”). Pursuant to the provisions of 28 U.S.C. § 1446, Ryerson attaches as **Exhibit A** the Class Action Petition (“Petition”) filed by plaintiff Connector Castings, Inc. (“Plaintiff”) in the State Court Action, as well as the Motion for Class Certification (“Motion”) filed by Plaintiff concurrently with the Petition.

Removal is timely pursuant to 28 U.S.C. § 1446(b) because Ryerson was served on May 14, 2015. Section 1446(b) gives the defendant 30 days to seek removal, meaning the removal period runs until the end of the day on June 13, 2015. A copy of this Notice is being served on Plaintiff’s counsel and will be filed with the Clerk of the Missouri Circuit Court for the 22nd Judicial Circuit.

Because a federal question exists, this is a civil action over which the district courts of the United States have original jurisdiction as provided in 28 U.S.C. § 1331. The Petition alleges a violation of the Telephone Consumer Protection Act (“TCPA”), 47 U.S.C. § 227, which gives rise to federal question jurisdiction. *See Mims v. Arrow Financial Services, LLC*, 132 S. Ct. 740, 748-49 (2012) (finding TCPA claim subject to federal question jurisdiction). Accordingly, this action is removable to this Court pursuant to 28 U.S.C. §§ 1331 and 1441.

For the foregoing reasons, this Court has subject-matter jurisdiction over this matter because it raises a federal question. Ryerson hereby reserves all defenses and objections to the Petition, including but not limited to: lack of personal jurisdiction, improper venue, *forum non conveniens*, insufficiency of process, insufficiency of service of process, and failure to state a claim.

Dated: May 28, 2015

Respectfully submitted,

/s/ Blaine C. Kimrey

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CERTIFICATE OF SERVICE

I hereby certify that on this 28th day of May 2015, a true and correct copy of the foregoing **Notice of Removal** was served via first-class mail upon:

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